

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

Keon Lipscomb

) Docket No. 14-613-NJR

) (To be supplied by the Clerk)

Plaintiff Keon Lipscomb,

) CIVIL RIGHTS COMPLAINT  
)\* pursuant to 42 U.S.C. §1983  
(State Prisoner).

-vs-

Warden Randy S Pfister

) CIVIL RIGHTS COMPLAINT  
□ pursuant to 28 U.S.C. §1331  
(Federal Prisoner)

Officer ~~John~~ ofc Auchensaw

) CIVIL COMPLAINT  
□ pursuant to the Federal Tort Claims  
Act, 28 U.S.C. §1346, 2671-2680

Officer ~~John~~ ofc Bailey

Ltd ~~John~~ Cherie

Defendant Keon Lipscomb.

med tec Richard Cations

I. JURISDICTION

A. Plaintiff's mailing address and/or register number and present place of confinement.

Keon Lipscomb R25793

Po Box 97 Pontiac, IL 61764

B. Defendant Randy S Pfister is employed as

Warden

(Name of First Defendant)

(Position/TITLE)

with I.D.O.C.

(Employer's Name and Address)

Po Box 97 Pontiac, IL 61764

At the time the claim(s) alleged in this complaint arose, was the defendant employed by the state, local or federal government?

Yes ( )

No ( )

If your answer is "yes", briefly explain:

the warden is the employer, in charge of officers conduct & the safety of inmates

C. Defendant DFC Buckenau is employed as  
(Name of Second Defendant)  
Officer  
(Position/TITLE)  
with I Do C  
(Employer's Name and Address)  
Po Box 99 Pontiac, IL 61764

At the time the claim(s) alleged in this complaint arose, was the defendant employed by the state, local or federal government?

Yes  No

If your answer is "yes", briefly explain:

DFC was / is an officer at the Pontiac C.C.

D. Using the outline of the form provided, include the above information for any additional defendant(s).

Med tec Richards  
First Name might be misspelled

it may be Clayton

Richard CLAYTONS

## II. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in state or federal court relating to your imprisonment?

Yes  No

B. If your answer to "A" is "yes", describe the lawsuit(s) in the space below. (If there is more than one (1) lawsuit, you must describe the additional lawsuits on another sheet of paper, using the same outline.) Failure to comply with this provision may result in summary denial of your complaint.

Yes; I filed 7 lawsuits out side of this one. 4 for excessive use of force, case dismissed (or 3) and 1 still pending, 1 for failure to protect, 1 won at trial, 1 for illegal strip search still pending and 1 for cruel & unusual punishment. 1 still pending

Pg 2.A

SFC Bailey Officer, P.O. Box 99, Pontiac, IL 61764  
Med tec Rickard cation P.O. Box 99, Pontiac, IL 61764  
LTD Cronie P.O. Box 99, Pontiac, IL 61764

Warden Randy S. Pfister, is sued in His  
individual and official ~~officer~~ capacities

SFC Bailey is sued in His individual &  
official Capacities

CFC Buchanan is sued in His individual  
& official capacities

LTD Cronie, is sued in His individual &  
official capacities

Med tec Rickard cation is sued in His official &  
individual capacities

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Previous suits

Keon Lipscomb v. Director S.A. Godinez  
12-1041 Honorable Judge, Mr. Judge,  
Joe Billy, Mc Dade, U.S. Central District  
Court

Basic claim, equal protection violation  
Discrimination, endangerment

The case was filed February 16 2012

Disposition ~~settled~~ January 23, 2014  
(Very trial) Jury rule in favor of Plaintiff Lipscomb  
against Defendant Pfister (Randy)

Keon Lipscomb v. Randy Pfister et. al

case pending filed December 2013

Case #13-1544 privacy issues, still pending

Keon Lipscomb v. Randy Pfister et. al

case pending filed January 2014

case #13-1545 mental Health concerns  
pending

3.A

Keon Lipscomb v. Randy S. Pfister et al  
112-01002, Honorable Judge, Mr. Judge  
Michael M. Michm, U.S. Central District Court

Basic claim, excessive force, failure to protect  
assault, Battery, Retaliation

the case was filed on, January 1, 2012  
disposition, pending

Keon Lipscomb v. Randy S. Pfister et al  
112-1061, Honorable Judge, Mr. Judge Michael M.  
Michm, U.S. Central District Court

Basic claim, cruel & unusual punishment,  
Retaliation, intentional infliction of emotional  
& mental distress

the case was filed February 18, 2012  
disposition, pending

⑧ 3c.B  
KeON Lipscomb v. Thomas Dart ET AL, 05 C-3262

U.S District court 219 S dearborn, Honorable  
Judge ms Judge Gottschall

Basic claim, failure to protect, unlawfull use of  
force & assault

the case was filed June 02, 2005, disposition on  
May 18 2009, the case was dismissed. (Settlement)

KeON Lipscomb v. Warden melvin Reed, ET AL, 09-cv-5036  
U.S District court 219, S. dearborn, Honorable  
Judge ms Judge Gottschall.

Basic claim, unlawfull use of force & ASSAULT

the case was filed August 11, 2009, disposition was  
on JAN 2012, the case was dismissed. (Settlement)

KeON Lipscomb v. Thomas Dart, ET AL, 05 c-2147  
U.S District court 219 S. Dearborn Honorable Judge  
ms Gottschall

Basic claim: failure to protect, unlaw use of force, & assault  
case was filed April, 12, 2005

deposition wts on May 18 2009

Case Dismissed (Settlement)

1. Parties to previous lawsuits:  
Plaintiff(s) \_\_\_\_\_  
  
Defendant(s) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
2. Court (if Federal Court, name the District; if State Court, name the County)  
\_\_\_\_\_
3. Docket number \_\_\_\_\_
4. Name of Judge to whom case was assigned \_\_\_\_\_
5. Type of case (for example: Was it a Habeas Corpus or Civil Rights action?)  
\_\_\_\_\_
6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?)  
\_\_\_\_\_
7. Approximate date of filing lawsuit \_\_\_\_\_
8. Approximate date of disposition \_\_\_\_\_

### III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? Yes \_\_\_\_\_
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure?  
Yes  No
- C. If your answer is "yes",
  1. What steps did you take? Counselor, Grievance office then sent the grievance to Springfield \_\_\_\_\_
  2. What was the result? Grievance denied \_\_\_\_\_
- D. If your answer is "no", explain why not. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? Yes ( ) No ( )

F. If your answer is "yes"

1. What steps did you take? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. What was the result? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

G. If your answer is "no", explain why not. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

H. Attach copies of your request for an administrative remedy and the response(s) you received. If you cannot do so, explain why not:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### IV. STATEMENT OF CLAIM

State here, as briefly as possible, the FACTS of your case. State who, what, when, where and how you feel your constitutional rights were violated. Do not cite cases or statutes. If you choose to submit legal arguments or citations, you must do so in a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits.

Only two (2) extra pages (8½ x 11") are permitted, if necessary, to complete your statement of claim. Additionally, attach any relevant supporting documentation.

on 12/9/11 I was unlawfully & unjustly attacked by  
I Cunningham officer Baile & Officer Buchanan  
& 2nd cronie and another unknown officer. while in  
my cell officer Buchanan was the gallery officer. me  
and Buchanan had an argument. Both now then told  
me that i will Not Be given back my laundry because of  
my mouth (Buchanan was passing out washed laundry)  
Offc. Buchanan turned off my water also, i Begun  
Kicking on the door until the 2nd cronie came  
who come and ordered me to stop kicking the door. I Complied  
I told him i wanted my laundry, then offc Buchanan  
Come to bring me a Sheet & Blanket, once my Chuck hole  
was open i was sprayed Directly in the Eyes with

Chemical agents (mace) By Lt Cronie, i was ordered to cuff up. once i complied i was taken down stairs by OFC Cunningham, once i was down, stood in front of the cage OFC Buckner was standing there alone with OFC Bailey. OFC Buckner said jail that shit Now then punched me in my Mouth Busting my nose then OFC Cunningham threw me on the ground, i looked up at OFC Bailey and said what the fuck Bro, i didn't do nothing then OFC Bailey kicked me in my face Lt Cronie put on Handcuffs like Brass knuckles Hitting me in my Head, Busting my Head open in two different places OFC's was stamping, going at my Back all the while Lt Please im sorry Please make them stop but they continued to beat me up telling me to Shut the fuck up and saying other obscenities they beat me up for like Two or three minutes, then OFC Buckner Put shackles on my legs and Dressed me to a Neon by cage By the Shackles i was cuffed to the back by officer Bailey, i was Disinfect the whole time, while getting there Lt Cronie told every body who beat me to check themselves for my blood Then OFC Buckner told Lt Cronie that He Hurt His finger, Lt Cronie to OFC to go to the Hospital and place that i threw Shupper on Him which i didn't then they called the med tec who come and say o that's sick com B FUCK HIM and never Received medical attention i was placed in cell 142 burning up with nose all over my body, i did Not Receive medical attention for the Beatings, I have informed the warden Pfister & Major Hobart of the incident and asked to Be Moved to a Different House because of Harassment and even went on a Hunger Strike for 38 days it was still Denied a House change, after i got beat inmates in cell 146, 147, 148 flooded the gallery with Nasty water that contained feces urine & trash, while officers who just beat me, kept dumping water the water was coming into my cell, i informed the officers But No one allow me out the Sewing the water out of my cell, or give me any cleaning supplies i was made to sleep in such a Nasty Smelly Cell, on that Night.

Count 1 Cruel & unusual punishment Count 2 excessive use of force count 3 ASSAULT count 4 Bullying count 5 intentional infliction of emotional Distress, count 6 Deliberate indifference to serious medical Need Count 7 Statutory & regulatory Factors against Pontiac Con. Center Count 8 Insonitary conditions

PJ 5

There is a code of silence amongst warden-officers

Wardens fail to train & supervise  
encouraging officers to act and violate  
rules & policies

Officers are rarely punished if ever  
Due to wardens fail to train

V. REQUEST FOR RELIEF

State exactly what you want the Court to do for you. If you are a state or federal prisoner, and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records or parole release), you must file your claim on a Habeas Corpus form, pursuant to 28 U.S.C. §2254, 28 U.S.C. §2255, or 28 U.S.C. §2241.

Award compensatory damages to Plaintiff in an amount to be determined jointly & severally against Defendants. Award punitive damages to Plaintiff in an amount to be determined jointly and severally against the Defendants sued in their individual capacities. Order Defendants to pay cost & fees & reasonable attorney fees. Remove Plaintiff from Segregation status placed back in General Population Status. Give Plaintiff a 30 year Segregation cut. Allow Plaintiff to be housed in the Health Care unit with Job as a factor at each prison housed. Grant such and other further Relief the Court Deems Equitable Just & Proper. I would like to press charges against my assailants. I request that the Defendants are Fired from Their Job at I.D.O.C.

VI. JURY DEMAND (check one box below)

The plaintiff does  does not  request a trial by jury. (See Fed.R.Civ.P. 38.)

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I, the undersigned, certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11(a) and (b) may result in sanctions, monetary or non-monetary, pursuant to Federal Rule of Civil Procedure 11(c).

The plaintiff hereby requests the Court issue all appropriate service and/or notices to the defendant(s).

Signed this 28 day of MAY, 2014.

Karen Diffs.com

Signature of Plaintiff

\_\_\_\_\_  
Signature of attorney, if any